



COMMONWEALTH of VIRGINIA

Matthew J. Strickler
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Blue Ridge Regional Office
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David K. Paylor
Director

Robert J. Weld
Regional Director

VIRGINIA WASTE MANAGEMENT BOARD ENFORCEMENT ACTION - ORDER BY CONSENT ISSUED TO BOTETOURT COUNTY SOLID WASTE PERMIT NO. 582

SECTION A: Purpose

This is a Consent Order issued under the authority of Va. Code § 10.1-1455, between the Virginia Waste Management Board, and Botetourt County for the purpose of resolving certain violations of the Virginia Waste Management Act and the applicable regulations.

SECTION B: Definitions

Unless the context clearly indicates otherwise, the following words and terms have the meaning assigned to them below:

1. "Administrative Process Act" or "APA" means Chapter 40 (§ 2.2-4000 *et seq.*) of Title 2.2 of the Va. Code.
2. "Board" means the Virginia Waste Management Board, a permanent citizens' board of the Commonwealth of Virginia, as described in Va. Code §§ 10.1-1184 and -1401.
3. "BRRO" means the Blue Ridge Regional Office of DEQ, located in Salem, Virginia.
4. "County" means Botetourt County, a political subdivision of the Commonwealth of Virginia. The County is a "person" within the meaning of Va. Code § 10.1-1400.
5. "Department" or "DEQ" means the Department of Environmental Quality, an agency of the Commonwealth of Virginia as described in Va. Code § 10.1-1183.

6. "Director" means the Director of the Department of Environmental Quality, as described in Va. Code § 10.1-1185.
7. "Landfill" means the Botetourt County Sanitary Landfill, a sanitary landfill operating under Solid Waste Permit No. 582 and located at 259 Landfill Road, Troutville, Virginia.
8. "Notice of Violation" or "NOV" means a type of Notice of Alleged Violation under Va. Code § 10.1-1455.
9. "Order" means this document, also known as a Consent Order.
10. "Permit" means Solid Waste Permit (SWP) No. 582, which was issued on May 11, 1995 under the Virginia Waste Management Act and the VSWMR to the County.
11. "Solid Waste" means any discarded material meeting the definition provided in 40 CFR § 261.2.
12. "Va. Code" means the Code of Virginia (1950), as amended.
13. "VAC" means the Virginia Administrative Code.
14. "VSWMR" or "Regulations" means the Virginia Solid Waste Management Regulations, 9 VAC 20-81-10 *et seq.*
15. "Virginia Waste Management Act" means Chapter 14 (§ 10.1-1400 *et seq.*) of Title 10.1 of the Va. Code. Article 4 (Va. Code §§ 10.1-1426 through 10.1-1429) of the Virginia Waste Management Act addresses Hazardous Waste Management.

SECTION C: Findings of Fact and Conclusions of Law

1. The County owns and operates the Landfill, which is located in Troutville, Virginia. Operations at the Landfill are subject to the Virginia Waste Management Act, the Permit, and the VSWMR. Certain aspects of operation of the Landfill are managed by County Waste, a private contractor.
2. On November 5, 2018, County Waste assumed operations of the Botetourt County Landfill excluding operations at the convenience center, scales and all environmental monitoring.
3. On December 12, 2018, DEQ-BRRO staff inspected the Facility for compliance with the Virginia Waste Management Act and VSWMR. Based on the inspection, three observations were noted:
 - a. On November 19, 2018 the daily tonnage had exceeded the daily disposal limit of 150 tons per day (172.31 tons)

- b. The Facility did not notify DEQ that they exceeded their permit limit on November 2018.
 - c. Botetourt County failed to conduct a self-inspection for the month of November 2018.
- 4. On December 20, 2018, the County held a public hearing on amendments to its solid waste management plan, specifically addressing the daily disposal rate. There were no citizen comments received. The Board voted unanimously in favor of the amendment.
- 5. On January 12, 2019, Draper Aden Associates submitted to VDEQ, Addendum 1 to the County's Solid Waste Management Plan to incorporate the daily disposal tonnage, service area and other information based on the agreement between the County and County Waste.
- 6. On January 14, 2019, VDEQ issued a Warning Letter in regards to the observations from the December 12, 2018 inspection.
- 7. On January 26, 2019, Draper Aden Associates on behalf of the County and County Waste submitted an application for a permit modification to VDEQ relative to the daily disposal tonnage increase to 300 tons per day. The permit modification application documented approval by VDOT for the increase and other pertinent information. The permit modification application requested that VDEQ grant a temporary authorization for the increase.
- 8. On January 29, 2019, the County responded to the Warning Letter indicating the following:
 - a. Daily tonnage exceedance: County Waste had been notified of the exceedance and are working to stay within it. The statement references the permit modification application filed by Draper Aden Associates on behalf of the County.
 - b. Self-inspections: More attention will be put forth to complete the self-inspection reports.
 - c. Reporting: Although not included in the Warning Letter, the County's letter does address a general comment in the inspection relative to reporting of unusual circumstances where steps must be taken to alter the normal operations. In this situation, it was at the convenience center and the compactor. The County's response indicates that it will report operational changes to the VDEQ in a timely manner.
- 9. On March 27, 2019 at 1:45 PM and 4:20 PM, and on March 28, 2019 at 6:45 AM, DEQ-BRRO staff inspected the Facility for compliance with the Virginia Waste Management Act and the VSWMR. Based on the inspection and follow-up information, the Department made the following observations:

- a. *On Wednesday, March 27, 2019 at 1:45 PM, a DEQ inspector entered the Landfill through an open gate. No attendant was present. The Landfill is not scheduled to be open on Wednesday afternoons. Apparently the gate was left open by law enforcement personnel who were using a firing range that is located within the fenced boundaries of the Landfill.*

Pursuant to 9 VAC 20-81-140(A)(8), access to sanitary, CDD, or noncaptive industrial landfills shall be permitted only when an attendant is on duty and only during daylight hours, unless otherwise specified in the landfill permit.

- b. *The Landfill working face was not covered overnight between March 27, 2019 and March 28, 2019.*

Pursuant to 9 VAC 20-81-140(B)(1)(c), Daily cover consisting of at least six inches of compacted soil or other approved material shall be placed upon and maintained on all exposed solid waste prior to the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. Alternate materials of an alternate thickness may be approved by the department if it has been demonstrated that the alternate material and thickness control disease vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment. At least three days of acceptable cover soil or approved material at the average usage rate shall be maintained at the landfill or readily available at all times.

Pursuant to Permit Section II.D.1, Daily cover consisting of six inches of compacted soil or other approved material shall be placed upon and maintained on all exposed solid waste prior to the end of each operating day or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging.

- c. *Daily tonnage exceeded the permit limit of 150 tons/day on February 28, 2019 by 8.36 tons and on March 18, 2019 by 8.21 tons. The County had applied on January 26, 2019 for a permit modification to increase the daily tonnage limit. As of the dates of these tonnage exceedances, the permit modification had not been approved.*

Pursuant to 9 VAC 20-81-100(B), all solid waste disposal facilities shall be maintained and operated in accordance with the permit issued pursuant to this regulation, and in accordance with the approved design and intended use of the facility.

Pursuant to Permit Section II.C, the Landfill has a disposal limit of 150 tons per day. This limit is based on the design, infrastructure, equipment, and staffing maintained by this facility.

- d. *Landfill personnel did not notify DEQ that they exceeded their permit limit on February 28 and March 18, 2019.*

Pursuant to 9 VAC 20-81-530(C)(3), the permittee shall report to the department any noncompliance or unusual condition that may endanger health or environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the circumstances and its cause; the period of occurrence, including exact dates and times, and, if the circumstance has not been corrected, the anticipated time it is expected to continue. It shall also contain steps taken or planned to reduce, eliminate, and prevent reoccurrence of the circumstances resulting in an unusual condition or noncompliance.

e. Waste delivered by County Waste Trucks is not inspected.

Pursuant to 9 VAC 20-81-100(E)(5), the owner or operator of all landfills (other than captive industrial landfills) shall implement an inspection program to be conducted by landfill personnel to detect and prevent disposal of those wastes prohibited in 9 VAC 20-81-40 and 9 VAC 20-81-140.

f. Landfill self-inspections were not conducted in December 2018 and February 2019.

Pursuant to 9 VAC 20-81-140(A)(16), each landfill shall implement an inspection routine including a schedule for inspecting all applicable major aspects of facility operations necessary to ensure compliance with the requirements of this chapter. Records of these inspections must be maintained in the operating record and available for review. At a minimum, the following aspects of the facility shall be inspected on a monthly basis: erosion and sediment controls, storm water conveyance system, leachate collection system, safety and emergency equipment, internal roads, and operating equipment. The groundwater monitoring system and gas management system shall be inspected at a rate consistent with the system's monitoring frequency.

Pursuant to Permit Section II(G), the Landfill shall implement an inspection routine including a schedule for inspecting all applicable major aspects of facility operations necessary to ensure compliance with the requirements of this chapter. Records of these inspections must be maintained in the operating record and available for review. At a minimum, the following aspects of the facility shall be inspected on a monthly basis: erosion and sediment controls, storm water conveyance system, leachate collection system, safety and emergency equipment, internal roads, and operating equipment.

10. On April 16, 2019, VDEQ issued a letter to Botetourt County indicating that the Part B/Major Permit Modification was administratively complete and that the County needed to pay the fee indicated.
11. On April 23, 2019, the County paid the fee.

12. On May 10, 2019, VDEQ issued a Technical Review No. 1 on the major permit amendment with four comments.
13. On May 21, 2019, based on the March 27 and 28, 2019 inspection and follow-up information, the Department issued NOV No. 19-04-BRRO-002 to the County for the violations described in Paragraph C(9) above.
14. On May 31, 2019, Draper Aden Associates issued a letter in response to Technical Review No. 1's request for additional information on the temporary authorization. The letter outlined the need for the temporary authorization as follows:

At the time of submittal in January, it was thought that sufficient detail had been provided to address the request for temporary authorization which was critical to the operations at that time and remains critical today. As you are aware, VDOT had no issues with the increased tonnage and County Waste currently has sufficient personnel and equipment to handle the increased tonnage. Of importance is that County Waste has limited control over tonnage entering the facility. The waste stream consists of the following primary entities:

1. *Franchised haulers contracted by the County*
2. *Residential tonnage from the County Convenience Center*
3. *County Waste collection vehicles*
4. *Commercial haulers operating within the County*

County Waste has an understanding of the franchised and residential tonnage from the County and can predict and control their tonnage; however commercial haulers or other entities within the service area are less predictable and controllable. The request for a temporary authorization in January 2019 recognized the inability of County Waste to control all the waste and the need (as part of the Agreement with the County) to complete the landfill closure in approximately 2 – 3 years which would require the additional tonnage. Most importantly, it would be difficult to turn away tonnage during a typical collection day. As County Waste has discussed with the County, they view their efforts at the landfill as working towards a solution to an on-going request by VDEQ to move this landfill towards closure and final capping as soon as possible.

At this time, County Waste is reaching and potentially exceeding the maximum permitted daily tonnage on heavy days. The average per County Waste trends below the daily maximum tonnage. As there does not appear to be any impact to human health or the environment, County Waste is respectfully requesting temporary authorization as soon as possible. Finalization of the TR-1 comments will follow.

15. On June 10, 2019, Botetourt County issued a letter to VDEQ, addressing the items in the Notice of Violation. The letter outlined steps that had been taken and actions that would be implemented to address the items in the Notice of Violation.

The letter ended with the following statement: "As indicated, Botetourt County, as the permit holder, could have been monitoring their operator better and has outlined a series of improvements above. County Waste is taking responsibility for its failure to meet certain permit requirements as outlined in the VDEQ Notice of Violation and is also

implementing a series of improvements going forward. Both parties will work diligently with the County in regards to the coming meetings and consent order with VDEQ.”

16. On June 13, 2019, DEQ staff and representatives of the County met to discuss the NOV. In attendance at the meeting were: Robert Steele and Nicole Tilley (VDEQ), Gary Larrowe and David Moorman (County), Jerry Cifor and Delbert Beasley (County Waste), Lynn Klappich (DAA). The letter from June 10, 2019 served as a basis for the discussion. During that meeting, the following discussions were held and conclusions made by VDEQ:
 - a. Unlocked gate – County provided DEQ with a letter from the Botetourt County Sheriff dated 5/31/19, that outlined steps to be taken to assure that the gate is locked or the entrance attended. DEQ staff indicated that this item had been adequately addressed.
 - b. Cover soil – County Waste and the County asked why a NOV had been issued. Per DEQ, it was because a Warning Letter had been issued in January for violations noted in a December inspection. Neither Mr. Larrowe (County Administrator) nor Mr. Cifor (County Waste) had ever seen this letter and apologized for their oversight. Measures to address cover were discussed. DEQ staff indicated that this item had been adequately addressed.
 - c. Reporting – measures to address this issue were discussed. DEQ staff indicated that this item had been adequately addressed.
 - d. Load inspections – measures to address this issue were discussed. DEQ staff indicated that this item had been adequately addressed.
 - e. Monthly self-inspection – measures to address this issue were discussed. DEQ staff indicated that this item had been adequately addressed.
 - f. It was indicated by DEQ staff that corrective action had been implemented by the County and County Waste in a timely manner and that this would be considered in development of the Consent Order.
17. On June 14, 2019, County staff provides April, 2019, May 2019 and June 1 – 13, 2019 tonnages to VDEQ and reports overages.
18. On June 14, 2019, DEQ staff contacted Draper Aden Associates requesting additional information on the permit modification application including origin of waste, staffing and size of working face. Draper Aden Associates provided the requested information by 12:44 PM.
19. On June 14, 2019, Draper Aden Associates provided DEQ staff with link to operations manual.
20. On June 18, 2019, DEQ-BRRO staff inspected the Facility for compliance with the Virginia Waste Management Act and the VSWMR. Based on the inspection and follow-up information, the Department made the following observations:
 - a. Daily tonnage exceeded the permit limit of 150 tons/day on the following dates: April 8, 11, 12, 15, 25, 29, May 6, 10, 12, 24, June 3, 10, 13, 20, 21, 28. The

County had applied on January 26, 2019 for a permit modification to increase the daily tonnage limit. As of the dates of these tonnage exceedances, the permit modification had not been approved. Dates and tonnages are summarized below:

DATE	TONNAGE REPORTED BY COUNTY AT SCALES	DIFFERENCE (TONS)
02/28/19 (Th)	158.40	8.40
03/18/19 (M)	158.20	8.20
04/08/19 (M)	160.61	10.61
04/11/19 (Th)	163.48	13.48
04/12/19 (F)	156.69	6.69
04/15/19 (M)	163.72	13.72
04/25/19 (Th)	171.90	21.90
04/29/19 (M)	162.54	12.54
05/06/19 (M)	193.02	43.02
05/10/19 (F)	182.53	32.53
5/13/2019 (M)	153.31	3.31
05/24/19 (F)	170.03	20.03
06/03/19 (M)	165.90	15.90
06/10/19 (M)	150.05	0.05
06/13/19 (Th)	161.43	11.43
06/20/19 (Th)	155.52	5.52
06/21/19 (F)	154.01	4.01
06/28/19 (F)	170.45	20.45

Pursuant to 9 VAC 20-81-100(B), all solid waste disposal facilities shall be maintained and operated in accordance with the permit issued pursuant to this regulation, and in accordance with the approved design and intended use of the facility.

Pursuant to Permit Section II.C, the Landfill has a disposal limit of 150 tons per day. This limit is based on the design, infrastructure, equipment, and staffing maintained by this facility.

- g. Landfill personnel did not notify DEQ that they exceeded their permit limit on the following dates: April 8, 11, 12, 15, 25, 29, May 6, 10, 12, 24, June 3, 10.

Pursuant to 9 VAC 20-81-530(C)(3), the permittee shall report to the department any noncompliance or unusual condition that may endanger health or environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days

of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the circumstances and its cause; the period of occurrence, including exact dates and times, and, if the circumstance has not been corrected, the anticipated time it is expected to continue. It shall also contain steps taken or planned to reduce, eliminate, and prevent reoccurrence of the circumstances resulting in an unusual condition or noncompliance.

21. On June 26, 2019, Draper Aden Associates contacted DEQ relative to the status of the application for modification of the daily disposal limit. Draper Aden Associates was informed via email that an approval letter was under review in Central Office.
22. On July 1, 2019, temporary authorization was approved by DEQ to increase the daily disposal limit at the Facility from 150 tons per day to 300 tons per day.
23. On July 11, 2019, DEQ approved the major amendment to the SWMP.
24. On July 18, 2019, the County received the inspection report relative to the June 18, 2019. The letter enclosed with the inspection report indicated that the alleged violations identified during the inspection would be addressed under a pending Consent Order.
25. On July 19, 2019, DEQ-BRRO staff inspected the Facility for compliance with the Virginia Waste Management Act and the VSWMR. Based on the inspection and follow-up information, the Department made the following observations:
 - a. Daily cover was not adequate overnight between July 18 and 19, 2019.

Pursuant to 9 VAC 20-81-140(B)(1)(c), Daily cover consisting of at least six inches of compacted soil or other approved material shall be placed upon and maintained on all exposed solid waste prior to the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. Alternate materials of an alternate thickness may be approved by the department if it has been demonstrated that the alternate material and thickness control disease vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment. At least three days of acceptable cover soil or approved material at the average usage rate shall be maintained at the landfill or readily available at all times.

Pursuant to Permit Section II.D.1, Daily cover consisting of six inches of compacted soil or other approved material shall be placed upon and maintained on all exposed solid waste prior to the end of each operating day or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging.

26. On August 9, 2019, the County received the inspection report relative to the July 19, 2019 inspection. The letter enclosed with the inspection report indicates that the alleged violations identified during the inspection would be addressed under a pending Consent Order.

27. On August 9, 2019, the County sent an email to VDEQ in response to the inspection report indicating that the side slope had been covered as had the area of flagging. In addition, the letter stated that the leachate seep had been repaired.
28. Based on the results of the March 27 and 28, June 18, and July 19, 2019 inspections and follow-up information, the Board concludes that the County has violated 9 VAC 20-81-140.(A)(8), 9 VAC 20-81-140(B)(1)(c), Permit Section II.D.1, 9 VAC 20-81-100(B), Permit Section II.C, 9 VAC 20-81-530(C)(3), 9 VAC 20-81-100(E)(5), 9 VAC 20-81-140(A)(16), and Permit Section II(G), as described in paragraph C(9), C(20), and C(25), above.
29. The County has submitted documentation that verifies that the violations described in Paragraph C(9), C(20), and C(26) above have been corrected.

SECTION D: Agreement and Order

Accordingly, by virtue of the authority granted it in Va. Code § 10.1-1455, the Board orders Botetourt County, and Botetourt County agrees to pay a civil charge of \$30,660.00 within 30 days of the effective date of the Order in settlement of the violations cited in this Order.

All payments shall be made by check, certified check, money order or cashier's check payable to the "Treasurer of Virginia," and delivered to:

Receipts Control
Department of Environmental Quality
Post Office Box 1104
Richmond, Virginia 23218

The County shall include its Federal Employer Identification Number (FEIN) (54-6001153) with the civil charge payment and shall indicate that the payment is being made in accordance with the requirements of this Order for deposit into the Virginia Environmental Emergency Response Fund (VEERF). If the Department has to refer collection of moneys due under this Order to the Department of Law, the County shall be liable for attorneys' fees of 30% of the amount outstanding.

SECTION E: Administrative Provisions

1. The Board may modify, rewrite, or amend this Order with the consent of the County for good cause shown by the County, or on its own motion pursuant to the Administrative Process Act, Va. Code § 2.2-4000 *et seq.*, after notice and opportunity to be heard.

2. This Order addresses and resolves only those violations specifically identified in Section C of this Order. This Order shall not preclude the Board or the Director from taking any action authorized by law, including but not limited to: (1) taking any action authorized by law regarding any additional, subsequent, or subsequently discovered violations; (2) seeking subsequent remediation of the facility; or (3) taking subsequent action to enforce the Order.
3. For purposes of this Order and subsequent actions with respect to this Order only, the County admits the jurisdictional allegations, findings of fact, and conclusions of law contained herein.
4. The County consents to venue in the Circuit Court of the City of Richmond for any civil action taken to enforce the terms of this Order.
5. The County declares that it has received fair and due process under the Administrative Process Act and the Virginia Waste Management Act and it waives the right to any hearing or other administrative proceeding authorized or required by law or regulation, and to any judicial review of any issue of fact or law contained herein. Nothing herein shall be construed as a waiver of the right to any administrative proceeding for, or to judicial review of, any action taken by the Board to modify, rewrite, amend, or enforce this Order.
6. Failure by the County to comply with any of the terms of this Order shall constitute a violation of an order of the Board. Nothing herein shall waive the initiation of appropriate enforcement actions or the issuance of additional orders as appropriate by the Board or the Director as a result of such violations. Nothing herein shall affect appropriate enforcement actions by any other federal, state, or local regulatory authority.
7. If any provision of this Order is found to be unenforceable for any reason, the remainder of the Order shall remain in full force and effect.
8. The County shall be responsible for failure to comply with any of the terms and conditions of this Order unless compliance is made impossible by earthquake, flood, other acts of God, war, strike, or such other occurrence. The County shall show that such circumstances were beyond its control and not due to a lack of good faith or diligence on its part. The County shall notify the DEQ Regional Director verbally within 24 hours and in writing within three business days when circumstances are anticipated to occur, are occurring, or have occurred that may delay compliance or cause noncompliance with any requirement of the Order. Such notice shall set forth:
 - a. the reasons for the delay or noncompliance;
 - b. the projected duration of any such delay or noncompliance;
 - c. the measures taken and to be taken to prevent or minimize such delay or noncompliance; and

d. the timetable by which such measures will be implemented and the date full compliance will be achieved.

Failure to so notify the Regional Director verbally within 24 hours and in writing within three business days, of learning of any condition above, which the County intends to assert will result in the impossibility of compliance, shall constitute a waiver of any claim to inability to comply with a requirement of this Order.

9. This Order is binding on the parties hereto, their successors in interest, designees and assigns, jointly and severally.
10. This Order shall become effective upon execution by both the Director or his designee and the County.
11. This Order shall continue in effect until:
 - a. The Director or his designee terminates the Order after the County has completed all of the requirements of the Order;
 - b. The County petitions the Director or his designee to terminate the Order after it has completed all of the requirements of the Order and the Director or his designee approves the termination of the Order; or
 - c. The Director or Board terminates the Order in his or its sole discretion upon 30 days' written notice to the County.

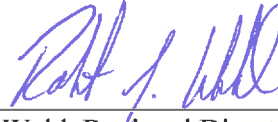
Termination of this Order, or any obligation imposed in this Order, shall not operate to relieve the County from its obligation to comply with any statute, regulation, permit condition, other order, certificate, certification, standard, or requirement otherwise applicable.

12. Any plans, reports, schedules or specifications attached hereto or submitted by the County and approved by the Department pursuant to this Order are incorporated into this Order. Any non-compliance with such approved documents shall be considered a violation of this Order.
13. The undersigned representative of the County certifies that he or she is a responsible official authorized to enter into the terms and conditions of this Order and to execute and legally bind the County to this document. Any documents to be submitted pursuant to this Order shall also be submitted by a responsible official of the County.
14. This Order constitutes the entire agreement and understanding of the parties concerning settlement of the violations identified in Section C of this Order, and there are no representations, warranties, covenants, terms or conditions agreed upon between the parties other than those expressed in this Order.

15. By its signature below, the County voluntarily agrees to the issuance of this Order.

16.

And it is so ORDERED this 14th day of January, 2020.



Robert J. Weld, Regional Director
Department of Environmental Quality

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The Botetourt County voluntarily agrees to the issuance of this Order.

Date: 11/21/19 By: Gary Lanowe

Commonwealth of Virginia

City/County of Botetourt

The foregoing document was signed and acknowledged before me this 21st day of

November, 2019 by Gary Lanowe

Susan H. Fain

Notary Public

109276

Registration No.

My commission expires: August 31, 2020

Notary seal:

